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16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18  
19  
20 RETIREE SUPPORT GROUP OF CONTRA  
COSTA COUNTY,

21 Plaintiff,

22 v.

23 CONTRA COSTA COUNTY,

24 Defendant.

CASE NO. C 12-00944 JST

**STIPULATION REGARDING  
DISCOVERY LIMITS AND CASE  
DEADLINES AND ~~PROPOSED~~ ORDER**

Judge: Hon. Jon S. Tigar

25  
26 WHEREAS, the parties have diligently engaged in discovery and have substantially  
27 completed document discovery;

28 WHEREAS, the parties have only taken one deposition (out of a total of, most likely, 30-

40) and anticipate propounding additional Interrogatories;

WHEREAS, Plaintiff and Defendant anticipate filing motions to compel production of documents that have been withheld on the basis of privilege after they have exhausted meet and confer efforts;

WHEREAS, the parties wish to continue to meet and confer on these and other discovery matters and resolve as many discovery issues as possible without Court intervention;

WHEREAS, the parties have reached a compromise regarding the disputed issues set forth in their most recent Joint Case Management Statement (Dkt. 91), and no longer need the Court's assistance in resolving these disputes;

NOW THEREFOR, the parties, by and through their respective counsel of record, hereby stipulate and agree to the following:

- (1) Plaintiff and Defendant may each propound up to 40 interrogatories without first obtaining leave of the Court.
- (2) Plaintiff and Defendant may each take up to 20 depositions without first obtaining leave of the Court.
- (3) Plaintiff agrees not to pursue its objection to Defendant's temporal limitation on document production, provided Plaintiff is also not required to produce documents created after July 1, 2011, and provided Defendant agrees to produce the most recent set of Memoranda of Understanding and Salary Resolutions.
- (4) All case deadlines will be extended as follows:

Event	Deadline
Fact discovery cut-off	1/20/15
Expert disclosures	2/23/15
Expert rebuttal	3/12/15
Expert discovery cut-off	4/9/15
Deadline to file dispositive motions	5/7/15
Pretrial conference statement due	6/22/15

Pretrial conference	6/30/15 at 2:00 p.m. or such other date available on the Court's schedule
Bench trial	7/20/15 at 8:30 a.m. or such other date available on the Court's trial schedule

**IT IS SO STIPULATED.**

DATED: June 2, 2014

LEWIS, FEINBERG, LEE, RENAKER &  
JACKSON, P.C.

By: /s/Nina Wasow

NINA WASOW  
Attorneys for Plaintiff  
RETIREE SUPPORT GROUP OF CONTRA  
COSTA COUNTY

DATED: June 2, 2014

HANSON BRIDGETT LLP

By: /s/Raymond Lynch

RAYMOND F. LYNCH  
Attorneys for Defendant  
CONTRA COSTA COUNTY

**IT IS SO ORDERED.**

Dated: June 4, 2014



SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Nina Wasow—the ECF User whose User ID and Password are used in the filing of this document—hereby attest that the concurrence to the filing of this document has been obtained from each of the other signatories to this document.

/s/Nina Wasow  
Nina Wasow